EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	**MDL NO. 16-2738 (FLW) (LHG)**

THIS DOCUMENT RELATES TO ALL CASES

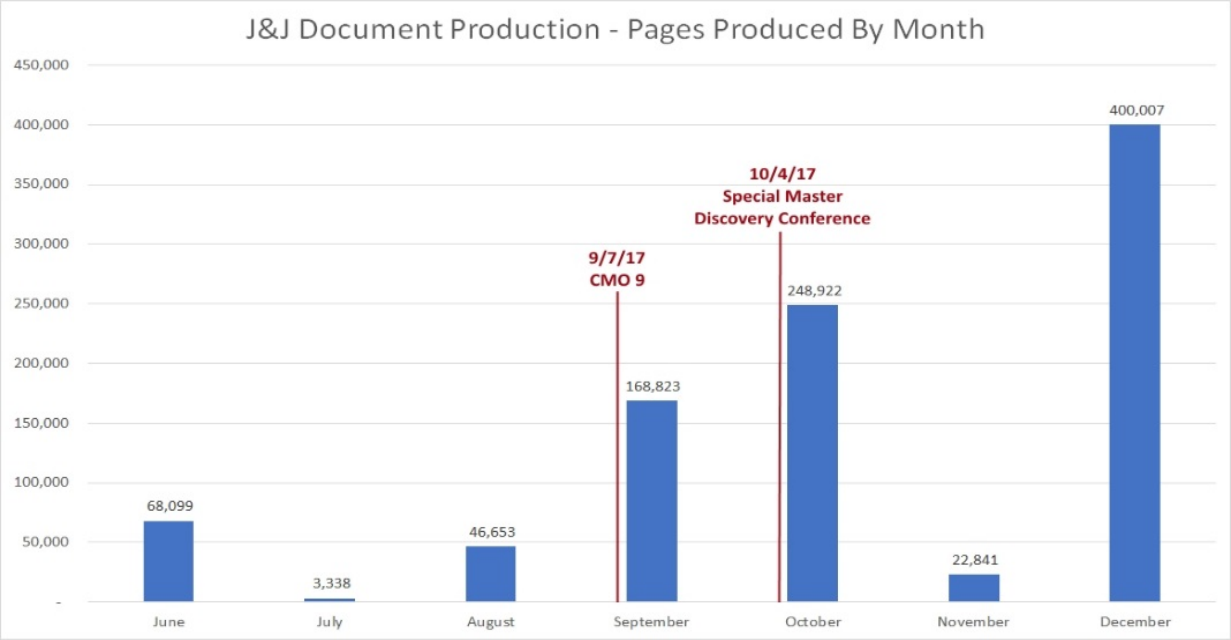
THE PLAINTIFFS' STEERING COMMITTEE'S
INITIAL DISCLOSURE OF POTENTIAL DEPONENTS

In accordance with the Court's December 7, 2017 Order, the Plaintiffs' Steering Committee (PSC) provides the below list of witnesses who may be subject to deposition and states as follows:

1. **The PSC's Initial Disclosure of its List of Potential Deponents:** On September 7, 2017, the Court ordered Defendants to complete their document productions by November 6, 2017. That deadline was subsequently extended for the J&J Defendants until December 20, 2017, and for Defendant Imerys until January 5, 2018. See CMO 9 (Doc. 673) and Amended CMO 9 (Doc. 2090). The entry of these Orders precipitated voluminous productions of new documents in the final days of the formal discovery period, with the largest volume of documents being produced to the PSC in the last several weeks. The specifics about these productions are described below:

A. **J&J Defendants**: Prior to the entry of CMO 9 in September 2017, J&J had produced 678,777 pages of documents. Most of these documents (508,705 pages) were the earlier "state court production" and were produced in the MDL in late April 2017. While J&J initially insisted this first production fulfilled its MDL discovery obligations, that proved not to be the case. Following the entry of CMO 9, the number of J&J documents requiring PSC review ballooned to over 1,500,000 pages, with over 400,000 pages being produced just days before Christmas. J&J's productions subsequent to its earlier "state court production" are illustrated by the following table:[1]

[1] A detailed analysis of the J&J Defendants' flawed productions is set forth in the PSC's letter of January 5, 2018 to Special Master Pisano, incorporated by reference. This letter also describes the relief that the PSC desires as a result of the J&J Defendants' defective productions.



B. **Imerys**: Pursuant to the Amended CMO 9 discovery timetable, Defendant Imerys made its final MDL production on January 5, 2018. Imerys produced just over 75,000 pages of new documents in the past 5 days.

2. **Supplementation and Amendment of this List**: Given the last-minute nature of defendants' productions, the PSC has not had adequate time to review this discovery. The list of deponents below is therefore initial and subject to change. As noted the PSC's letter of January 5, 2018 to Special Master Pisano requests an extension until April 30, 2018 to supplement this list with additional potential deponents.

3. **The Number of Potential Deponents:** In preparing its initial list of proposed deponents, the PSC was guided by the number of fact witnesses deposed in MDL's of similar size, significance and complexity, including cases where J&J was a defendant:[2]

[2] Cases involving J&J as a defendant are noted with an "*".

CASE	Fact/Corporate Depositions Taken or Permitted[3]	PSC Experts Identified	Defense Experts Identified	Total Plaintiffs
In Re: Pradaxa (Dabigatran Etexilate) Products Liability Litigation, MDL No. 2385 (S.D. Il.)	47 (2-day limit)	0[4]		~4,000
In Re: Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Relevant Products Liability Litigation, MDL No. 2100 (S.D. Il.)	57	~28		~20,000
In Re: Vioxx Products Liability Litigation, MDL No. 1657 (E.D. La.)	90	23		~56,000
In Re: Xarelto (Rivaroxaban) Products Liability Litigation*, MDL No. 2592 (E.D. La.)	45 (2-day limit by Court Order)	23	40	19,192
In Re: Gadolinium Based Contrast Agent Litigation, MDL No. 1909 (N.D. Oh.)	32 (20 were 2 days or longer)	19	9	~1,000
In Re: Tylenol (Acetaminophen) Marketing and Sales Practice and Products Liability Litigation*, MDL No. 2436 (E.D. Pa.)	20 (by Court Order)	12		275
In Re: Testosterone Replacement Therapy Products Liability Litigation, et al., MDL No. 2545 (N.D. Il.)	80 AbbVie - 43 Auxillium - 37 (by Court Order)	21		
In Re: Benicar (Olmesartan) Products Liability Litigation, MDL No. 2606 (N.J.)	50 general causation only (by Court Order)	6		~2,500
In Re: Actos (Pioglitazone) Products Liability Litigation, MDL No. 2299 (W.D. La.)	~50	17	16	~6,000
In Re: DePuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation*, MDL. No. 2244 (E.D. Tx.)	~80	~12-15	~12-15	~9,500

[3] This number does not include third party non-party witnesses.
[4] Case settled before expert disclosures.

4. **Timing and Logistics of Depositions:** The PSC requests depositions begin only after it has had a reasonable opportunity to review 800,000+ pages of documents newly produced by Defendants following the entry and amendment of CMO 9. The PSC proposed in its January 5, 2018 letter that this issue would be an appropriate topic for the parties to cover with the Special Master at the upcoming January 22, 2018 conference. See fn. 1.

5. **Scope of the List:** The PSC limited its list of witnesses to those who it expects can shed light on the issues the Court has already deemed discoverable, including science-related issues and "what defendants knew". See Hearing Transcript, Sept. 6, 2017, pp. 4-14. The PSC did not include witnesses whose responsibilities appear to be primarily in the areas of marketing, sales and distribution, and reserves the right to request depositions of additional witnesses who have information in these areas and on these topics at a later date.

6. **30(B)(6) witnesses:** The PSC has endeavored to identify 30(b)(6) witnesses on the substantive topics outlined below, but reserves the right to supplement those topics as appropriate and necessary.

WITNESSES

The PSC submits the following individuals as potential deponents. For the Court's convenience, the PSC provides the witness's title, as best as the PSC could discern it. Many of these witnesses, however, were employed for decades and may have held numerous positions and played different roles with respect to the issues in this case.

I. JOHNSON & JOHNSON DEFENDANTS

1. **Bruce Semple –** Director, Medical & Regulatory Affairs

2. **Charles Wajszczuk –** Director, Product Safety; Senior Director, Medical Safety Officer, Office Safety and Toxicology Consumer Health Care

3. **Donald "Don" Hicks –** Former Senior Director, Quality Assurance

4. **Jethro Ekurta –** Vice President, Global Head of Multiple Franchises and Regional Head of North America, Global Regulatory Affairs, J&J Consumer Inc.

5. **Erin McNabb –** Product Surveillance Scientist

6. **George Lee –** Director, Applied Research

7. **Helen Han Hsu –** Vice President, Head of Drug Safety Sciences

8. **Homer Swei –** Associate Director, Product Stewardship

9. **James Molnar –** Director, Laboratory Services

10. **Jane Cai –** Senior Director, Analytical Development

11. **Jijo James –** Chief Medical Officer, JJCI

12. **Joan Casalvieri –** Director, Toxicology

13. **John Hopkins** – Former Director, Worldwide Category of Infant Care and Consultant

14. **John Lemmo –** Principal Scientist; Research Manager, Fellow, Analytical SMP

15. **Katharine Martin –** Senior Director, Research & Development

16. **Kathleen Wille –** Senior Director, Scientific and External Regulatory Policy, Product Stewardship

17. **Lorena Telofski –** Associate Director, Research and Development, Global Scientific Engagement

18. **Michael Chudkowski –** Manager, Preclinical Toxicology

19. **Nancy Musco –** Manager, Product Safety & Education

20. **Regina Gallagher –** Principal Scientist

21. **Santosh Jiwrajka –** Vice President, Quality Assurance

22. **Simonette Cordero Soriano –** Safety Surveillance Physician

23. **Steve Mann –** Former Director of Toxicology for J&J Consumer & Personal Products Worldwide (CPCUS)

24. **Susan Nettesheim –** Vice President, Product Stewardship & Health Care Compliance

25. **Susan Nicholson –** Vice President, Safety Surveillance and Risk Management, Consumer Products

26. **Tara Glasgow –** Vice President, Research and Development, Baby and Scientific Engagement

27. **Teresa Gonzalez Ruiz –** Product Director

28. **Timothy McCarthy –** Director, Office of Safety and Toxicologist

29. **William "Bill" J. Powers, Jr. –** Former Vice-President, Global Preclinical Development, Toxicologist

30. **30(b)(6) Witness(es)**:
    i. Relationship between J&J and JJCI, including historical relationships;
    ii. Corporate structure;
    iii. Manufacturing and testing of talc, including chain for custody for samples maintained;
    iv. Safety assessment and monitoring to talcum powder products;
    v. Relationship between J&J entities and other stakeholders including with co-defendants and FDA; and
    vi. Evidentiary foundation for documents.

II. IMERYS TALC AMERICA, INC.[5]

1. **Craig Bernard –** Regulatory Affairs and Product Stewardship; Environmental and Health Scientist

2. **Dave Matlock** – Operations Manager

3. **Ed McCarthy –** Scientist

4. **Eric Turner –**Vice President, Health and Safety Sustainability

5. **Jim Kopp –** Manager

6. **Jocelyn Ferret –** Project Stewardship and Analytical Lab Manager

7. **John Poston –** Sr. Quality Manager

8. **Julie Pier –** Global Laboratory Manager/Senior Scientist

9. **Kent Cutler –** Vice President, Sales & Marketing

10. **Maurizio Coggiola –** Commissioned Expert

[5] Includes all predecessor companies.

11. **Michele Refregier –** Chief Medical Officer

12. **R. Wayne Ball –** Environmental & Health Scientist

13. **Shripal Sharma –** Global Director, Product Stewardship

14. **Steve Jarvis –** Director, Health, Safety & Environment

15. **Phillippe Moreau** – Geologist

16. **Jon Godla** – Vice President Operations

17. **30(b)(6) Witness(es)**:
    i. Corporate structure and relationship to predecessor entities;
    ii. Relationship with co-Defendants and other entities like FDA;
    iii. Mining, manufacturing, testing, and safety and quality assessment of talc for talcum powder products; and
    iv. Evidentiary foundation for documents.

III. Personal Care Products Council

1. **Gerald "Jerry" McEwen –** Former Vice President, Science

2. **John Bailey –** Former Executive Vice President, Science

3. **Alan Andersen –** Former Director, Cosmetic Ingredient Review (CIR)

4. **Ivan Boyer** – Chief Toxicologist, Cosmetic Ingredient Review (CIR)

5. **Monice Fiume –** Senior Scientific Analyst/Writer, Cosmetic Ingredient Review (CIR)

6. **30(B)(6) Witness(es)**:
    i. Structure and relationship to predecessor entities;
    ii. Relationship with co-defendants and other entities like FDA and CIR; and
    iii. Evidentiary foundation for documents.

IV. NON-PARTIES

1. **William "Bill" Kelly, Jr. –** Consultant and Western Representative, Center for Regulatory Effectiveness (CRE)

2. **Jim Tozzi –** Member, CRE Advisory Board; Director, Multinational Business Services, Inc.

3. **Colorado School of Mines –** 30(b)(6) witnesses

4. **Crowell and Moring –** Consultant on Regulatory Affairs, 30(b)(6) witnesses

5. **Joshua Muscat –** Consulting Scientist

6. **Michael Huncharek** – Consulting Physician and Scientist, founder of Meta-Analysis Research Group

7. **IMA-North America –** Industrial Minerals Trade Association

8. **McCrone Associates –** Asbestos Testing and Analysis Laboratory

9. **RJ Lee –** Asbestos Testing and Analysis Laboratory

Date: January 10, 2018

Respectfully Submitted,

s/Michelle A. Parfitt
Michelle A. Parfitt
ASHCRAFT & GEREL, LLP
4900 Seminary Road, Suite 650
Alexandria, VA 22311
Telephone: 703-931-5500
Email: mparfitt@ashcraftlaw.com

s/P. Leigh O'Dell
P. Leigh O'Dell
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, PC
218 Commerce Street
Montgomery, AL 36104
Telephone: 334-269-2343
Email: leigh.odell@beasleyallen.com

s/Christopher M. Placitella
Christopher M. Placitella
COHEN PLACITELLA ROTH, PC
127 Maple Avenue

Red Bank, NJ 07701
Telephone 888-219-3599
Facsimile: 215-567-6019
Email: cplacitella@cprlaw.com